

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>VASHON WOOLRIDGE,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 08-C-3374</b>
	)	
<b>v.</b>	)	<b>Judge Kocoras</b>
	)	
<b>P.O. CHRISTOPHER, individually;</b>	)	<b>Magistrate Judge Cox</b>
<b>P.O. JOHN DOE, individually; and,</b>	)	
<b>THE CITY OF CHICAGO,</b>	)	<b>Jury Demand</b>
	)	
<b>Defendants.</b>	)	

**SECOND AMENDED COMPLAINT**

Now comes, the Plaintiff, Vashon Woolridge, by and through his attorneys, Gregory E. Kulis & Associates, Ltd., and complaining against the Defendants, P.O. Christopher, individually; P.O. John Doe, individually; and the City of Chicago, states as follows:

**COUNT I – FALSE ARREST**

- 1) This action is brought pursuant to the laws of the United States Constitution, specifically, 42 U.S.C. §1983 and §1988, and the laws of the State of Illinois, to redress deprivations of the Civil Rights of the Plaintiff and accomplished by acts and/or omissions of the Defendants committed under color of law.
- 2) Jurisdiction is based on Title 28 U.S.C. §1343 and §1331.
- 3) The Plaintiff, Vashon Woolridge, at all relevant times, was a United States citizen and permanent resident of the State of Illinois.
- 4) The Defendants, P.O. Christopher and P.O. John Doe, were, at all relevant times, duly appointed police officers of the City of Chicago and, at all relevant times, were acting within their scope of employment and under color of law.

5) The Defendant, City of Chicago, was and is at all relevant times a municipal corporation duly incorporated under the laws of the State of Illinois, and is the employer and principal of Defendants P.O. Christopher and P.O. John Doe.

6) On or about May 26, 2007, the Plaintiff, Vashon Woolridge, was walking down the street in the vicinity of Christiana and Huron in Chicago.

7) The Plaintiff, Vashon Woolridge, was not committing a crime or breaking any laws.

8) The Plaintiff, Vashon Woolridge, was approached by the Defendants, P.O. Christopher and P.O. John Doe., who stopped and searched him.

9) The Plaintiff, Vashon Woolridge, has nothing illegal in his possession.

10) The Plaintiff, Vashon Woolridge, had some words with the officers and they arrested him.

11) There was no probable cause for the arrest.

12) Said actions of the Defendants, P.O. Christopher and P.O. John Doe, were intentional, willful and wanton.

13) Said actions of the Defendants, P.O. Christopher and P.O. John Doe, violated the Plaintiff, Vashon Woolridge's, Fourth Amendment Rights and were in violation of said rights protected by 42 U.S.C. §1983.

14) As a direct and proximate consequence of said conduct of Defendants, P.O. Christopher and P.O. John Doe, the Plaintiff, Vashon Woolridge, suffered violations of his constitutional rights, monetary expense, fear, emotional distress, pain and suffering.

Wherefore, the Plaintiff, Vashon Woolridge, prays for judgment against the Defendants, P.O. Christopher and P.O. John Doe, jointly and severally, in an amount in

excess of Twenty-Five Thousand Dollars (\$25,000.00) in compensatory damages and Ten Thousand Dollars (\$10,000.00) in punitive damages, plus attorney's fees and costs.

### **COUNT II – MALICIOUS PROSECUTION**

1-11) The Plaintiff, Vashon Woolridge, hereby realleges his allegations of paragraph 3-13 of Count I as his allegations of paragraphs 1-11 of Count II as though fully set forth herein.

12) This matter went to court and was resolved in favor of the Plaintiff.

13) The actions of the Defendants, P.O. Christopher and P.O. John Doe, constitute malicious prosecution under Illinois law.

14) As a direct and proximate cause of the actions of the Defendants, P.O. Christopher and P.O. John Doe, the Plaintiff, Vashon Woolridge, suffered monetary expense, fear, emotional distress, pain and suffering, and anxiety.

Wherefore, the Plaintiff, Vashon Woolridge, prays for judgment against the Defendants, P.O. Christopher and P.O. John Doe, jointly and severally, in an amount in excess of Fifteen Thousand Dollars (\$15,000.00) in compensatory damages and Ten Thousand Dollars (\$10,000.00) in punitive damages, plus attorney's fees and costs.

### **COUNT III- INDEMNIFICATION**

1-11) The Plaintiff, Vashon Woolridge, hereby realleges and incorporates his allegations of paragraphs 3-13 of Count I as his respective allegations of paragraphs 1-11 of Count III as though fully set forth herein.

12) Illinois law provides that public entities are directed to pay any tort judgment for compensatory damages for which employees are liable within the scope of their employment activities.

13) Defendants P.O. Christopher and P.O. John Doe are employees of the City of Chicago Police Department who acted within the scope of their employment in committing the misconduct described herein.

WHEREFORE, should Defendants P.O. Christopher and P.O. John Doe be found liable for the acts alleged above, Defendant City of Chicago would be liable to pay the Plaintiff any judgment obtained against said Defendants.

**JURY DEMAND**

The Plaintiff, Vashon Woolridge, requests a trial by jury.

Respectfully submitted,

Vashon Woolridge,

By: /s/ David S. Lipschultz  
Gregory E. Kulis & Associates, Ltd.

David S. Lipschultz  
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<b>THE CITY OF CHICAGO,</b>	)	<b>Jury Demand</b>
	)	
<b>Defendants.</b>	)	

**NOTICE OF FILING**

To: Mr. Thomas J. Platt  
City of Chicago Department of Law  
30 N. LaSalle, Suite 1400  
Chicago, Illinois 60602

PLEASE TAKE NOTICE that on this 3<sup>rd</sup> day of September 2008, I caused to be electronically filed with the Clerk of the District Court for the Northern District of Illinois the attached **PLAINTIFF'S SECOND AMENDED COMPLAINT**.

/s/ David S. Lipschultz  
GREGORY E. KULIS & ASSOCIATES, LTD.

**CERTIFICATE OF SERVICE**

PLEASE TAKE NOTICE that on the 3<sup>rd</sup> day of September 2008, I, DAVID S. LIPSCHULTZ, an attorney, served the attached document(s) upon the aforementioned address(es) by electronically filing the same with the Clerk for the U.S. District Court for the Northern District of Illinois, Eastern Division, a copy of which was then forwarded to each attorney of record.

/s/ David S. Lipschultz

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